FINAL
SITE MANAGEMENT PLAN
EASTERN PLUME — OPERABLE UNIT 1

NEW CASSEL/HICKSVILLE
GROUNDWATER CONTAMINATION SUPERFUND SITE
NASSAU COUNTY, NEW YORK

U.S. EPA Site No. NY0001095363
Revision: 0

EnSafe Project Number:
0888820265

Prepared for:

101 Frost Street Associates, L.P. and Next Millennium Realty, LLC

April 2022

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ACRONYMS

ERP	Emergency Response Plan
NCIA	New Cassel Industrial Area
NYSDEC	New York State Department of Environmental Conservation
OU	Operable Unit
ppm	parts per million
SMP	Site Management Plan
U.S. EPA	United States Environmental Protection Agency
$\mu g/m^3$	micrograms per cubic meter
µg/L	micrograms per liter
VOC	Volatile Organic Compound

1.0 INTRODUCTION

On behalf of 101 Frost Street Associates, L.P. and Next Millennium Realty LLC, EnSafe, Inc. has prepared this Site Management Plan (SMP) for the Pre-Design Investigation for the Eastern Plume of Operable Unit (OU) 1 of the New Cassel/Hicksville Groundwater Contamination Superfund Site (Site), located in Nassau County, New York. The remedy for OU1 was selected in the OU1 Record of Decision issued by the United States Environmental Protection Agency (U.S. EPA) on September 30, 2013.

1.1 Purpose

This SMP was prepared to provide the applicable procedures to be implemented during operation and maintenance of the selected remedy, once installed. Additional documents have been prepared for the Eastern Plume under separate cover that are intended to accompany this plan:

- Field Sampling Plan: Describes procedures for collection of field samples and related field activities.

- Quality Assurance Project Plan: Describes quality assurance/quality control measures, sample analysis and data handling requirements, chain-of-custody procedures, and project data objectives.

- Health and Safety Plan with Emergency Response Plan: Details site-specific health and safety requirements and procedures to be used in the event of an accident, spill, or emergency at the site including responsible parties, community meetings, notification requirements, and compliance requirements.

1.2 Project Organization

Key project personnel are summarized in Table 1.

Table 1
Key Project Personnel

Title	Name	Contact Information
U.S. EPA Project Manager	Julio Vasquez	vasquez.julio@epa.gov 212-637-4323
EnSafe Project Manager	Alexandra Stark	astark@ensafe.com 860-920-5172
Operation and Maintenance Team Leader	To be determined	To be determined

2.0 BACKGROUND

2.1 Site Description and Background

The Site comprises a widespread area of groundwater contamination within the Town of North Hempstead, Town of Hempstead, and the Town of Oyster Bay, all of which are located in Nassau County, New York (Figure 1). The Site is approximately 6.5 square miles. The Site was listed on the National Priorities List in 2011.

The Site's OU1 is a discrete portion of contaminated groundwater downgradient of the New Cassel Industrial Area (NCIA) located within the Towns of North Hempstead and Hempstead. OU1 is located primarily in Salisbury, an unincorporated area of the Town of Hempstead, and the portion of OU1 north of Grand Boulevard is located within the Hamlet of New Cassel, in the Town of North Hempstead (Figure 2). OU1 is approximately 211 acres and consists of residential properties, as well as some commercial areas.

Upgradient of OU1 is the NCIA, which is currently being managed by the New York State Department of Environmental Conservation (NYSDEC). The NCIA encompasses approximately 170 acres and is bounded by the Long Island Railroad to the north, Frost Street to the east, Old Country Road to the south, and Grand Boulevard to the southwest.

The Town of Hempstead's Bowling Green Water District operates Wells 1 and 2 on property that is located within OU1 (labeled as Hempstead-Bowling Green Wells 1 and 2, on Figure 2). The Bowling Green Water District has been treating groundwater pumped from these two wells since 1990, when a granular activated carbon system was installed. Five years later, the treatment system was supplemented with an air stripper. The treatment system is still in operation. The Town of Hempstead continues to maintain monitoring and treatment activities to address volatile organic compound (VOC) contamination prior to its distribution to the drinking water system.

2.2 Nature of Groundwater Contamination

The Site has been characterized by VOC contaminated groundwater that has impacted several water supply wells, including four Town of Hempstead municipal wells, six Hicksville water supply wells, and one Village of Westbury water supply well. Analytical results of groundwater samples from the Site have revealed concentrations of VOCs in excess of the U.S. EPA's promulgated health-based protective maximum contaminant levels and New York State's standards.

The term plume defines an area of groundwater contamination with concentrations of total VOCs greater than 100 micrograms per liter (µg/L). OU1 has three plumes, the Western Plume, the Central

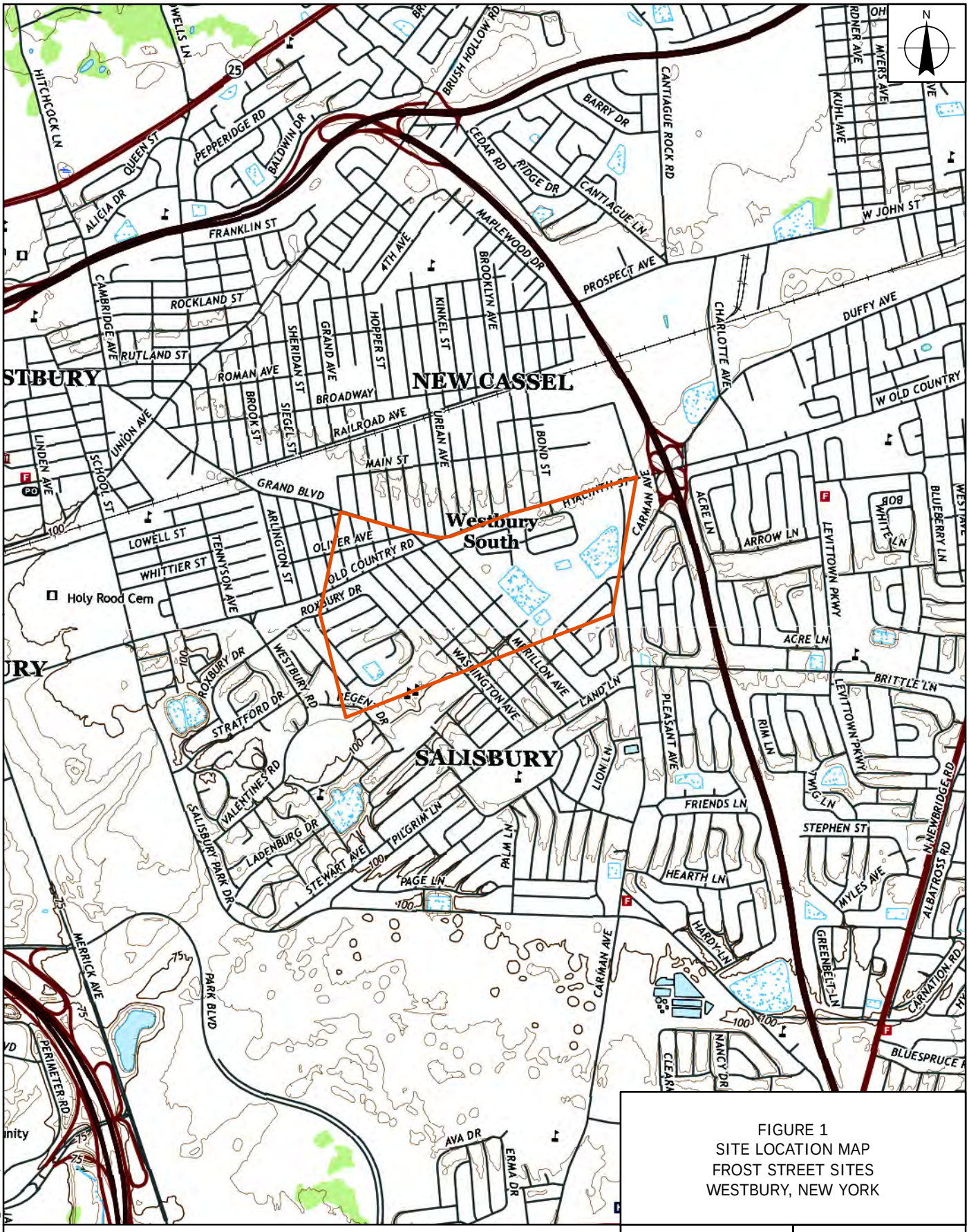

FIGURE 1
SITE LOCATION MAP
FROST STREET SITES
WESTBURY, NEW YORK

LEGEND

OPERABLE UNIT 1 OF NEW CASSEL/HICKSVILLE GROUNDWATER CONTAMINATION SUPERFUND SITE

NAD 1983 STATE PLANE
NEW YORK ISLAND FEET

0 1,000 2,000

SCALE IN FEET

REQUESTED BY:	AS
DRAWN BY:	MS
DATE:	3/11/2021
PROJECT:	0888820265

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Source: U.S. Geological Survey. Freeport & Hicksville Quadrangles, New York [Map]. Photorevised 2019. 1:24,000. 7.5 Minute Series.

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FIGURE 2
SITE MAP
FROST STREET SITES
WESTBURY, NEW YORK

LEGEND

HEMPSTEAD-BOWLING GREEN WELLS 1 AND 2

OPERABLE UNIT 1 OF NEW CASSEL/HICKSVILLE GROUNDWATER CONTAMINATION SUPERFUND SITE

NAD 1983 STATE PLANE
NEW YORK ISLAND FEET

0 350 700

SCALE IN FEET

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Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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Plume, and the Eastern Plume, each with different source areas and contamination chemical compositions.

At the time of data collection for the OU1 Record of Decision (2011), the Eastern Plume, subject of this SMP, was comprised predominantly of tetrachloroethene up to 16,000 µg/L with some trichloroethene and concentrations less than 23 µg/L of 1,1,1-trichloroethane. Contamination appears to migrate deeper as the distance along the plume axis increases away from the NCIA. Subsequent groundwater sampling events indicate the Eastern Plume groundwater concentrations have decreased.

2.3 Remedial Components

This section will be written once the Eastern Plume remedy has been constructed.

3.0 INSTITUTIONAL CONTROL IMPLEMENTATION ASSURANCE PLAN

This Institutional Control Implementation Assurance Plan has been prepared in accordance with *Institutional Controls: A Guide to Planning, Implementing, Maintaining, and Enforcing Institutional Controls at Contaminated Sites* (U.S. EPA, December 2012) and *Institutional Controls: A Guide to Preparing Institutional Controls Implementation and Assurance Plans at Contaminated Sites* (US. EPA, December 2012).

The Institutional Control Implementation Assurance Plan will be completed once the Eastern Plume remedy has been constructed and will include plans to implement, maintain, and enforce the institutional controls at the Eastern Plume, including:

- *Description of the pathways for potential human exposure to hazardous substances that may remain during and/or after completion of construction of the remedial action*
- *Description of the proposed institutional controls and their purpose (i.e., letters to local government)*
- *Description of the proposed duration of each institutional control and an explanation for such duration*
- *Schedule for implementing each institutional control*
- *Plan for monitoring, maintaining, and reporting on, the continued efficacy of the institutional controls*
- *Schedule for periodic certifications regarding whether the institutional controls remain in place, regarding whether the institutional controls have been complied with, and steps taken to address any problems with informational or governmental controls as applicable*

4.0 TRANSPORTATION AND OFFSITE DISPOSAL PLAN

4.1 Purpose

This Transportation and Offsite Disposal Plan has been prepared to ensure compliance with the following:

- Hazardous substances, pollutants, and contaminants may be shipped from the Site to an offsite facility only if the shipment is in compliance with Section 121(d)(3) of CERCLA, 42 U.S.C. § 9621(d)(3), and 40 CFR § 300.440. Compliance with CERCLA §121(d)(3) and 40 CFR §300.440 regarding a shipment will be achieved by obtaining a prior determination from U.S. EPA that the proposed receiving facility for such shipment is acceptable under the criteria of 40 CFR §300.440(b).

- Wastes may be shipped from the Site to an out-of-state waste management facility only if, prior to any shipment, notice is provided to the appropriate state environmental official in the receiving facility's state and to the U.S. EPA Remedial Project Manager. Such notice is not required for any offsite shipment when the total quantity of all such shipments does not exceed 10 cubic yards. The notice will include the following information, if available:

  1) Name and location of the receiving facility
  2) Type and quantity of wastes to be shipped
  3) Schedule for the shipment
  4) Method of transportation

  Notification will also be made to the state environmental official referenced above and the U.S. EPA Remedial Project Manager of any major changes in a shipment plan, such as a decision to ship the waste to a different out-of-state facility. This notice will be provided after the award of the contract and before the wastes are shipped.

- Investigation derived waste may be shipped from the Site to an offsite facility only if the shipment is in compliance with Section 121(d)(3) of CERCLA, 42 U.S.C. §9621 (d)(3), 40 CFR §300.440, EPA's Guide to Management of Investigation Derived Waste, (January 1992). If wastes are shipped offsite to a laboratory for characterization or if RCRA hazardous wastes that meet the requirements for an exemption from RCRA under 40 CFR §261.4(e) are shipped offsite for treatability studies, they are not subject to 40 CFR §300.440.

4.2 Anticipated Investigate-Derived Wastes

Anticipated wastes include soil, wastewaters (groundwater and decontamination fluids), personal protective equipment, and disposables, as described in the *Field Sampling Plan* (EnSafe, April 2022). All wastes will be segregated by waste streams and placed in USDOT-approved 55-gallon drums, roll-offs, or tanks, as appropriate. Wastes will be stored in a to-be-identified storage area (likely on 89/101 Frost Street). This storage area will be surrounded by chain-link fence and secured with a locked gate.

Wastes will be shipped to U.S. EPA-approved offsite facilities in compliance with Section 121(d)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 United States Code §9621 (d)(3), 40 Code of Federal Regulations §300.440, EPA's Guide to Management of Investigation Derived Waste (U.S. EPA, January 1992).

4.2.1 Soil

Soil will be collected and contained within USDOT-approved 55-gallon drums or roll-offs. Wastes will be characterized for offsite disposal; analytical methods and sample frequency will be provided by the to-be-selected disposal facility. A log of all shipments and copies of all manifests and/or bills of lading will be maintained.

4.2.2 Wastewaters

If required, a Nassau County Department of Public Works (NCDPW) discharge authorization will be procured which will allow for wastewaters to be discharged to the sewer at pre-selected discharge point(s) for conveyance treatment at the NCDPW publicly owned treatment works. This approval and associated supporting documentation will be provided to U.S. EPA prior to discharging any wastewater into the sewer. Water produced during well development and/or decontamination, will be containerized in 55-gallon drums and/or frac tanks and disposed in accordance with this discharge authorization.

If NCDPW discharge authorization cannot be obtained, wastewaters will be containerized in frac tanks and characterized and disposed of offsite at an approved disposal facility.

4.2.3 Personal Protective Equipment and Disposables

PPE and disposables will be disposed of as solid waste.

4.3 Anticipated Remedial Wastes

Once the remedy for the Eastern Plume is finalized, this portion of the Transportation and Offsite Disposal Plan will be completed and will include the following information:

- *Identification of remedial wastes*
- *Storage procedures for remedial wastes*
- *Proposed routes for offsite shipment of wastes*
- *Identification of communities affected by shipment of wastes*
- *Description of plans to minimize impacts on affected communities*

5.0 QUALITY OF LIFE PLAN

This Quality of Life Plan has been prepared to provide measures to minimize the adverse effects to the community resulting from the remedial activities.

5.1 Community Air Monitoring Plan

During all ground intrusive activities, continuous perimeter air monitoring and work zone monitoring will be conducted in accordance with the Community Air Monitoring Plan (Appendix A).

Air monitoring stations will be placed upwind of, downwind of, and at the work zone and will include monitoring for total organic vapors and particulates. All readings will be reordered and available for NYSDEC and New York State Department of Health personnel; any readings used for decisions purposes will also be recorded. Pertinent action levels are summarized below.

Total Organic Vapors

If the downwind perimeter exceeds 5 parts per million (ppm) above background (i.e., upwind perimeter) for the 15-minute time-weighted average, work activities will be temporarily halted and monitoring will continue.

- If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities will resume with continued monitoring.

- If total organic vapor levels at the downwind perimeter persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities will resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less (but in no case less than 20 feet) is below 5 ppm over background for the 15-minute average.

- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities will be shutdown.

Particulate Monitoring, Response Levels, and Actions

If the downwind PM-10 particulate level is 100 micrograms per cubic meter ($\mu g/m^3$) greater than background (i.e., upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques will be employed. Work will continue with dust

suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 µg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 µg/m^3 above the upwind level, work will be stopped and a re-evaluation of activities initiated. Work will resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 µg/m^3 of the upwind level and in preventing visible dust migration.

Dust Management

If necessary based on air monitoring data, the contractor shall implement dust control measures to minimize the potential for dust generation during site activities. Dust control measures will include wetting the ground and stockpiles, covering stockpiles with plastic sheeting, and limiting dust generating activities during periods of high winds. These measures will be implemented as appropriate for the site condition.

Vapor/Odor Management

If necessary, although considered unlikely, the contractor shall implement odor control measures to minimize the potential exposure to nuisance odors, including containerizing or covering impacted soil. Large stockpiles of impacted soil will not be generated during remedy implementation (shallow soil to be excavated for pipe installation is not impacted), so it is unlikely that foam odor suppressant will be necessary.

5.2 Noise and Vibration Management

Continuous noise or vibration monitoring will not be performed during implementation of the remedy, given the routine nature of the remedial activities. Noise will be monitored by the Engineer with a handheld device to collect measurements during construction activities that yield appreciable noise; vibration will be monitored visually.

The remedy will be implemented in accordance with the local ordinance: *Town of North Hempstead Code, Section 38, Noise*. Acts prohibited by the Noise Code which are applicable to the remedy implementation are described below:

- "Between the hours of 6:00 p.m. the previous day to 7:30 a.m., weekdays, and at any time on weekends or holidays, such that the sound therefrom creates a noise disruption across a residential real property boundary or within a sound-sensitive zone, except for cases of urgent necessity in the interest of public safety and then only with a permit from the Building

Department, which permit may be renewed for a period of 3 days or less while the emergency continues, or public service utilities."

- "Vibration: operating or permitting the operation of any device that creates vibration which is above the vibration perception threshold of an individual at or beyond the property of the source if on private property or at approximately 50 feet from the source if on a public space or public right-of-way. For the purposes of this section, 'vibration perception threshold' means the minimum ground or structure borne vibrational motion necessary to cause a normal person to be aware of the vibration by such direct means as, but not limited to, sensation by touch or visual observation of moving objects. This section shall not apply to construction activities performed in compliance with all applicable federal state and any local laws and ordinances."

Construction activities will not exceed the following levels required by the local ordinance, as presented in Table 2.

Table 2
Noise Limits

Continuous Sound Levels which Pose an Immediate Threat to Health and Welfare (measured at 50 feet or 15 meters)	
Sound Level (decibel)	**(Limit Duration)**
90	24 hours
93	12 hours
96	6 hours
99	3 hours
102	1.5 hours
105	45 minutes
108	22 minutes
Impulsive Sound Levels which Pose an Immediate Threat to Health and Welfare (measured at 50 feet or 15 meters) Impulsive Sound Levels Which Pose an Immediate Threat to Health and Welfare (measured at 50 feet or 15 meters)	
Sound Level (decibel)	**Limit Number of Repetitions per 24-Hour Period**
145	1
135	10
125	100

Should noise levels exceed applicable limits, mitigation measures may include noise and vibration monitoring, placement of noise barriers, and alternative construction methods, if possible.

5.3 Erosion and Sediment Control

There are catch basins located adjacent to the work zone; erosion and sediment control measures such as silt fences and hay bales will be placed around the catch basins to prevent soil from migrating to them. The contractor will manage stockpiles and open excavations appropriately to minimize

erosion and sedimentation (e.g. covering stockpiles with plastic and covering excavations with road plates overnight).

Additional sections will be added as necessary.

6.0 MONITORING PLAN

This Monitoring Plan has been prepared to obtain baseline information regarding the extent of contamination in affected media at the Eastern Plume; to obtain information, through short- and long-term monitoring, about the movement of and changes in contamination throughout the Eastern Plume, before and during implementation of the remedial action; to obtain information regarding contamination levels to determine whether performance standards are achieved; and to obtain information to determine whether to perform additional actions, including further monitoring.

The Monitoring Plan will be completed once the Eastern Plume sampling needs and remedy are known and will include the following information:

- *Description of the environmental media to be monitored*
- *Description of the data collection parameters, including existing and proposed monitoring devices and locations, schedule and frequency of monitoring, analytical parameters to be monitored, and analytical methods employed*
- *Description of how performance data will be analyzed, interpreted, and reported, and/or other related requirements for the Eastern Plume*
- *Description of verification sampling procedures*
- *Description of deliverables that will be generated in connection with monitoring, including sampling schedules, laboratory records, monitoring reports, and monthly and annual reports to U.S. EPA and NYSDEC*
- *Description of proposed additional monitoring and data collection actions (such as increases in frequency of monitoring, and/or installation of additional monitoring devices in the affected areas) in the event that results from monitoring devices indicate changed conditions (such as higher than expected concentrations of the contaminants of concern or groundwater contaminant plume movement)*

7.0 REFERENCES

EnSafe Inc. *Emergency Response Plan – Eastern Plume, New Cassel/Hicksville Groundwater Contamination Superfund Site. Nassau County, New York.* April 2022.

- *Health and Safety Plan – Eastern Plume, New Cassel/Hicksville Groundwater Contamination Superfund Site. Nassau County, New York.* April 2022.

- *Quality Assurance Project Plan – Eastern Plume, New Cassel/Hicksville Groundwater Contamination Superfund Site. Nassau County, New York.* April 2022.

- *Field Sampling Plan – Eastern Plume, New Cassel/Hicksville Groundwater Contamination Superfund Site. Nassau County, New York.* April 2022.

United States Environmental Protection Agency. *EPA's Guide to Management of Investigation Derived Waste. OSWER 9345.3-03FS.* January 1992.

- *Institutional Controls: A Guide to Planning, Implementing, Maintaining, and Enforcing Institutional Controls at Contaminated Sites, OSWER 9355.0-89, EPA/540/R-09/001*. December 2012.

- *Institutional Controls: A Guide to Preparing Institutional Controls Implementation and Assurance Plans at Contaminated Sites, OSWER 9200.0-77, EPA/540/R-09/02.* December 2012.

- *Record of Decision, Operable Unit 1, New Cassel/Hicksville Ground Water Contamination Superfund Site, Towns of North Hempstead, Hempstead and Oyster Bay, Nassau County New York*. September 2013.

APPENDICES

Appendix A
Community Air Monitoring Plan

Appendix A
Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

(this CAMP is based on NYSDOH Generic CAMP from NYSDEC DER-10)